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May 16, 2006

Mr. Nigel Robinson
United States Environmental Protection Agency
Region II- 290 Broadway, 19th Floor
New York, NY 10007-1866

VIA Federal Express

RE: Chemsol, Inc. Superfund Site
Conceptual Model and Evaluation of the Vapor Intrusion Pathway

Dear Mr. Robinson:

Attached for your use and information please find a report entitled "Conceptual Site Model and Evaluation of the Vapor Intrusion Pathway" for the Chemsol Superfund Site in Piscataway, NJ. This report was prepared in response to EPA's second Five-Year Review Report (USEPA, September 2005) in which they recommended that although the vapor intrusion pathway is currently incomplete, the potential for a vapor intrusion pathway should be investigated as part of the OU-3 RI/FS.

The attached report was prepared by HydroQual, Inc. and reviewed by Dr. Paul C. Johnson. Among his many professional credentials, Dr. Johnson is the renowned co-author of the Johnson and Ettinger vapor intrusion model.

Within the attached report is a compilation of data from various remedial activities, which are then used to develop a conceptual site model for the site. Based on these data, an evaluation conducted in accordance with USEPA and NJDEP Guidance was completed to determine if the groundwater to indoor air pathway is complete or incomplete for off-site (i.e., OU-3) residential buildings.

The collective data supports a determination that the vapor intrusion pathway is incomplete. However, to support this finding, it is recommended to install a new monitoring well adjacent to the MW-203 cluster in the overburden, and to monitor this location to confirm the absence of VOC concentrations above screening levels. Long-term monitoring at this location will provide ongoing confirmation that the vapor intrusion pathway at this site is incomplete.

Conceptual Site Model and Evaluation of the Vapor Intrusion Pathway

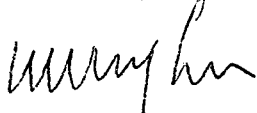
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Thank you for your attention in this matter.

Very truly yours,

de maximis, inc.



William J. Lee

cc: Paul Harvey, NJDEP
Chemsol Technical Committee
Alison Saling, Esq., KLNG
Tim Roeper, HydroQual, Inc.